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### **Comments on the Water-Efficient Product Market Enhancement Program**

As a follow-up to the October 9 Stakeholder Meeting in Washington D.C., I offer the following additional information as well as responses to the comments and presentations by individuals during the meeting:

1. Water and energy use are often inextricably linked. Various reports have estimated that anywhere from 7 to 25 percent of a State's total energy use (depending upon the state) is dedicated to delivering, pumping, heating, cooling, or treating water and wastewater. In most situations, reductions in the use of water will also reduce energy consumption.

On the flip side, how energy is generated and conserved can have a profound impact in conserving water. A recent report by the Southwest Energy Efficiency Project<sup>1</sup> states that "a typical new coal-fired power plant in the (southwest) region consumes about 0.67 gallons of water per kWh while a typical new natural gas-fired combined cycle power plant consumes about 0.33 gallons of water per kWh." In many cases, the amount of water used can be lowered if less energy is generated. Likewise, equipment and appliances that conserve energy by reducing the amount of hot water used can save both energy and water.

These facts confirm that energy conservation should not be ignorant of water impacts, nor should water conservation ignore energy impacts.

2. Implementation of a labeling program by the water industry is underway. Some of the largest wholesale and retail water providers in the U.S. support the idea of providing consumers, business, and government with needed information on water-efficient products of all types. In other countries, water efficient labeling programs have been underway for some time.
3. Most of the speakers on October 9 placed the proposed program in the context of residential applications. For example, many presenters and others stated that such a program would be targeted at "consumers." This was likely based upon incomplete information, unless one defines "consumers" as all likely purchasers of water-efficient products. In fact, the labeling program will be especially beneficial to businesses and institutions in a variety of sectors, not the least of which are service and equipment providers. New and innovative products are being developed in response to water supply and treatment issues and, of course, the related operating costs. As such, priority in development of the water industry's labeling program will likely be focused on these products.
4. Inference was made at the meeting that the experiences with toilets over the past 10 years somehow negate the concept of a water-efficient product labeling program. It should be recognized that priorities need to be set for product labeling. Labeling some products, such as those in the cooling and irrigation equipment sectors, offer greater immediate savings potential and are less complicated to implement. Certainly some products will be

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<sup>1</sup> Southwest Energy Efficiency Project, 2002. *The New Mother Lode, The Potential for More Efficient Electricity Use in the Southwest*, November.

challenging, just as they have proved to be in the energy sector, but that is not a reason to reject the concept of labeling them. For example, to suggest that toilet fixtures are some kind of indicator of why a labeling program should not be implemented is disingenuous.

5. The Energy Star presentation indicated that “labeled products play (a) minor role” in the Commercial-Institutional-Industrial sectors. Although this may be true for the Energy Star program, we do not believe that such applies to the labeling program for water-efficient products. As noted in 2. above, the experiences by the water industry in reaching into the commercial and institutional sectors indicates that not only is labeling possible (due to the products that exist and are being developed), but it would be eagerly received by the business community and managers of institutional operations.
6. The Energy Star representative stated that for the commercial sector, product specifications should preclude the need for a product label, also stating that business doesn’t care about labels. In our contact with commercial sector business, we strongly disagree. We have found that businesses desire every bit of assistance available in making their purchase decisions and are particularly in need of simple, informative measuring sticks and guidelines that carry a scientific basis in fact. As such, all evaluations and subsequent labeling of water-efficient products will be based upon product design and performance specifications, together with the necessary standardized test methods. Furthermore, scientifically based specifications can ultimately serve as the foundation for voluntary industry consensus standards.
7. The California Urban Water Conservation Council, as one of several large organizations leading the water industry’s implementation of a labeling program, strongly supports a tiered system of water-efficient product labeling. Such a system would be patterned after the voluntary Australian 5A scheme presented on October 9. The 5A scheme is designed to promote, among other things, the development of new products at higher levels of efficiency than those already in the marketplace.
8. Standards are important in the labeling process, but not a substitute for it. That is, whereas current standards specify a minimum level of performance of a new product, that minimum level does not necessarily reflect the water-efficiency (nor the product longevity) that is desired by the water industry or the customer. Thus, products that achieve performance superior to the standard should be those that are given priority recognition in a labeling program. We must therefore discard the thought that the voluntary industry consensus standards for performance somehow provide for all of the efficiency desired and thereby eliminate the need for a rating and labeling process.
9. The inclusion of a toilet flush volume chart in the Energy Star presentation was unfortunate. It left the impression that toilet labeling is the major interest of water stakeholders. The author of the presentation obviously did not understand the context in which the particular study was undertaken and mistakenly assumed that toilet fixtures were a component of the water industry’s labeling goal.